

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler, District
Court Judge

Honorable Karen M. Williams,
Magistrate Judge

Honorable Thomas Vanaskie (Ret.),
Special Discovery Master

[PROPOSED] ORDER

THIS MATTER having come before the Court upon the ZHP Parties' Objection to Special Master Order No. 35, and the Court having considered the parties' submissions; and for good cause shown:

It is, on this _____ day of _____
2021, **ORDERED AND ADJUDGED** that the motion to vacate Special Master Order No. 35 is **GRANTED**;

IT IS FURTHER ORDERED that the ZHP Parties' cross-motion for a protective order precluding the production of documents prohibited from production under Chinese law is **GRANTED**.

Robert B. Kugler,
United States District Judge